

How Well is NEPPS Working?

A Summary Comparison of Several Recent Evaluations of the National Environmental Performance Partnership System

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Introduction

This paper summarizes and compares a number of recently conducted evaluations of the National Environmental Performance Partnership System (NEPPS).¹ It is intended for use by State and EPA officials and other interested parties who are considering next steps to improve the NEPPS process. In particular, attendees at the 1999 ECOS-EPA NEPPS Workshop, and senior EPA and ECOS officials charged with joint evaluation of the NEPPS process may find this a helpful primer. This brief synopsis aims to highlight key findings of, as well as the consistencies and differences among, the reports. The process of distillation by its nature tends to simplify and eliminate details. Readers with an interest in understanding the issues raised here will benefit from reading the detailed problem analyses and recommendations contained in the original reports.

The reports vary in scope. Some examine the entire NEPPS process, drawing systemic conclusions by looking at a number of states and EPA Regional offices. Others focus on a particular EPA Region's or State's experience, specific program areas, and/or one component of the NEPPS process, e.g., the Performance Partnership Grant (PPG).

As described in the 1995 ECOS/EPA *Joint Commitment to Reform Oversight and Create a National Environmental Performance Partnership System*, the purpose of NEPPS is to “strengthen our protection of public health and the environment by directing scarce public resources toward improving environmental results, allowing states greater flexibility to achieve those results, and enhancing our accountability to the public and taxpayers”. The NEPPS program, according to this agreement, will “achieve more integrated environmental management, promote pollution prevention and enhance environmental results”. The Joint Commitment defines seven principal components of NEPPS:

- increased use of environmental goals and indicators
- a new approach to program assessments by States
- environmental performance agreements
- differential oversight
- performance leadership programs
- public outreach and involvement, and
- a joint system evaluation

The remaining text organizes the evaluations' conclusions into a set of general findings, and findings in five specific categories, roughly corresponding to the principal NEPPS components: joint strategic planning/priority setting, administrative flexibility/burden reduction, programmatic flexibility, performance measurement, and public participation.

¹ The reports that were reviewed include: seven Office of Inspector General (OIG) Management Assistance Reviews (MARS) for the States of Alaska, Colorado, Connecticut, Delaware, Georgia, Indiana, and Texas; two OIG Regional Audits of Regions 4 and 8; a systemic review of the NEPPS system by the United States General Accounting Office (GAO); and meeting summaries from the Denver and the Providence NEPPS Training Sessions. The National Academy of Public Administration (NAPA) is also reviewing the NEPPS process; no public review drafts were available to include in this summary document.

Attached to this memo are two tables that provide a more detailed comparison and summary of each report's findings. Table 1, the NEPPS Evaluations Summary Matrix, provides an easy way to scan each report's conclusions on how well NEPPS has achieved its objectives and potential in the five categories named above. Table 2, Selected Findings and Examples, organizes key findings and examples from each report into Positive Outcomes and Reasons for Success, Examples of NEPPS Successes, Barriers and Reasons for Lack of Success, and Recommendations. These more detailed findings and examples are also organized according to the five categories described above.

General Findings

The evaluations are generally quite consistent in the benefits and successes they attribute to NEPPS implementation, as well as in the problems, and underlying causes of those problems, they identify. Recommendations for improving the NEPPS process, however, vary widely. The majority of those interviewed for these reports supported the philosophy and objectives of NEPPS. All the reports found that participants in the NEPPS process believed that it had been beneficial and had improved the state-EPA relationship. In particular, the evaluations identified improved communications between EPA and the states, as well as greater senior management attention to program priorities and issues, as frequently cited NEPPS benefits. However, most evaluation participants also believed that progress to date falls substantially short of the overall promise and potential of NEPPS to improve the State/EPA partnership and enhance the achievement of environmental results. The NEPPS process resulted in the most successful outcomes in those states and EPA Regions that were committed to developing performance-based management system, and that benefitted from the active support and involvement of the agency's top leadership.

Joint Strategic Planning and Priority Setting

The evaluations indicate that while the NEPPS process has facilitated a move towards a partnership between EPA and states through improved communication and joint planning, a more rigorous and robust joint strategic planning and priority setting process is needed for the success of NEPPS. Joint strategic planning and priority setting are critical to the NEPPS process in that they foster understanding between EPA and states and lead the relationship from one based on a historical EPA oversight role to one based on partnership, focused on results. The evaluations suggest that a stronger joint planning process will enable federal and state agencies to tackle related issues of accountability, program flexibility, and differential oversight more effectively .

The reports cited the following current barriers to joint strategic planning efforts:

- Disagreement both within EPA (particularly between Regions and Headquarters), as well as between States and EPA, about the role EPA should play in enforcement and compliance, the level of necessary oversight, the types of data states should report to maintain accountability, and the amount of work sharing that should occur;
- Lack of clear EPA guidance about how to implement joint strategic planning; and
- EPA's size and complexity inhibiting internal communication.

Some successful examples of joint planning and priority-setting were identified. For example, the Region 8 OIG Audit highlighted the joint process used by the Utah Department of Environmental Quality, a state regional health agency, and EPA Region 8 to develop solutions to some of the region's environmental problems.

Selected recommendations for improving the planning process include:

- Develop a more rigorous joint strategic planning/priority setting process through EPA guidance;
- Strengthen the state self-assessment process to provide more state accountability; and
- States and EPA each develop agreed-upon, well defined priorities before entering the joint strategic planning process to improve negotiations and to ensure full buy-in and cooperation (e.g., without full agreement among EPA managers about program oversight of NEPPS states, emphasis on accountability concerns constrains opportunities for differential oversight and burden reduction).

Administrative Flexibility/Burden Reduction

The evaluations indicate that NEPPS participants' experience with administrative flexibility and burden reduction were mixed. Most NEPPS participants experienced some administrative flexibility and savings; however, certain states actually noted increased burden. The evaluations identified two primary impediments to flexibility and burden reduction:

- EPA accountability concerns lead to identical or increased state reporting requirements, as EPA program managers are inclined to retain existing measures of state activity until results-based systems prove to be an effective alternative (this impediment is closely tied to joint strategic planning/priority setting and agreement on internal priorities); and
- State financial management systems built for administering grants along media program lines constrain the resource flexibility that over-arching NEPPS grants can offer.

Utilizing results-based performance measures is more difficult than tracking traditional activity measures and will in many cases tend to increase the cost of data collection and reporting. Therefore, NEPPS participants moving towards a performance-based measurement system may, in at least some instances, need to increase investments in data collection and reporting, which may be contrary to many states' expectations of reduced reporting.

Selected recommendations for enhancing flexibility and reducing burden include the following²:

² The 4/15/99 *Addendum to 1997 Joint Statement on Measuring Progress under NEPPS: Clarifying the Use and Applicability of Core Performance Measures*, signed jointly by ECOS and EPA leadership, affirms the joint commitment to reducing unnecessary state reporting, and establishes a policy framework that uses the value of information, balanced with its cost, as criteria for determining what information is (or is not) necessary. The *Addendum*, and an April 7 memorandum from Peter Robertson entitled "State Partnership on Burden Reduction," set in motion a process whereby EPA and States are encouraged to discuss potential information collection/reporting changes that would result in higher value/lower cost information.

- Creating state financial management systems that can flexibly administer non-categorical grants; and
- Supporting “differential oversight,” thereby reducing state reporting burden and other administrative costs, through strengthening the joint strategic planning/priority setting processes.

Programmatic Flexibility

NEPPS participants indicated that significant institutional barriers have impeded the utilization of programmatic flexibility potentially available through Performance Partnership Grants (PPGs). The evaluations identified the following barriers to programmatic flexibility:

- Individual media programs’ program-specific focus results in resistance to funding multi-media projects that do not directly benefit a specific program;
- EPA program-by-program organization and operations management constrain funds transfer across media program lines (e.g., national program offices set rules on media-specific program money use, which in turn limits state-level media program fund transfers); and
- State and federal legislative/regulatory requirements often earmark money (and require tracking) according to specific programs.

The evaluations did identify instances where NEPPS participants successfully utilized programmatic flexibility. For example, Minnesota, partly as a result of a cross-media agency re-organization, was able to take effective advantage of the flexibility offered with their PPG. North Carolina and Utah also implemented cross-media program fund transfers.

Some evaluators suggested very specific ways to improve programmatic flexibility within the current institutional framework. However, the evaluations suggest that, to realize the promise of NEPPS flexibility, EPA and states will need to find ways to address systemic, institutional barriers such as media-specific program management.

Selected recommendations to improve flexibility include:

- EPA should improve guidance on the development and implementation of the PPA/PPGs that clarifies the circumstances under which cross-program funding transfers may occur; and
- EPA and states should create incentives for individual media programs to participate in multi-media initiatives

Performance Measurement

NEPPS places a strong emphasis on environmental performance measurement as a key component of developing a more results-based management system. Accordingly, the evaluations paid substantial attention to performance measurement. The evaluations reflect a consensus that substantial progress has been made in measuring program performance and environmental outcomes. The FY2000 Core Performance Measures agreed upon by EPA and ECOS are regarded as a substantial improvement over prior versions, with fewer total measures and a greater percentage of outcomes. Despite progress, measures that truly link program efforts to environmental outcomes remain far too few,

and most NEPPS participants believe that performance measurement still has a long way to go before it truly supports outcome-based management. While state and federal managers generally support the concept of performance measurement, there are many varied ideas about how to implement it. Some states, such as Florida and Minnesota, have gone beyond the national CPMs and developed their own state-specific measures.

The reports identify a number of reasons why performance measures have not yet fulfilled their potential.

- Confusion exists about whether reporting of CPMs by states is required, and about the uses and applications of CPMs (are they to measure individual states' performance, compare states using common benchmarks, or 'paint a national picture?').³
- Measurement of programmatic effectiveness and environmental results is inherently more challenging than tracking program activities, and requires a long-term commitment to be successful. Challenges to developing effective performance measures include the following.
 - Quality data necessary for connecting program performance to environmental conditions are lacking. Certain evaluations suggested that it may take years of data collection to support environmental trends measures.
 - Isolating environmental agency impacts on environmental quality from other significant drivers such as environmental activity, life style changes, environmental attitudes, and climate variability has proven difficult.
 - State capacity to support the resource-intensive process of developing measures tying agency actions to environmental outcomes is constrained.

Selected recommendations for improving performance measurement include:

- Continue developing performance measures that tie program activities to environmental conditions, while revising expectations for their development and utilization to acknowledge that it is a large, expensive, and time consuming endeavor;
- Revise expectations and investment plans to recognize the inherent complexity and the long term data needs of performance measurement; and
- Clarify state CPM reporting requirements to minimize future confusion.

Public Participation

Most of the evaluations spent little time addressing the issue of public participation in the NEPPS process. Some reports noted the absence of public participation and suggested that involving the public would greatly improve NEPPS outcomes, through both additional input and greater knowledge and buy-in. Several reports suggested that EPA and the states make future public participation in NEPPS a higher priority.

³ The 4/15/99 *Addendum* (cited above) attempts to address these questions. The *Addendum* may have been too recent to be well known to those interviewed in the course of many of the studies reviewed here.

NEPPS Evaluations Summary Matrix

Report	Administrative Flexibility/ Burden Reduction	Programmatic Flexibility	Performance Measures	Planning and Partnership	Public Participation
MAR Connecticut (NEPPS approach 97-99)	/ Experienced administrative savings due to flexibility; data reporting increased	/ Difficulty in shifting funds across programs; marginal flexibility achieved	† Most CPMs incorporated, but not measuring environmental results; progress made on environmental indicators	† Communication & coordination improved	† PPA increased pace of outreach activities
MAR Alaska (98 PPG & 98/99 PPA workplan)	† Increased flexibility to move resources within water programs	~ Increased flexibility for State over what is to be accomplished, but program performance suffered, according to EPA	† CPMs not incorporated into PPA/PPG; no data available for some CPMs	/ Communication between State & Region enhanced due to priority setting; priority setting took place too late & EPA program officials were left out	~ public participation did not increase
MAR Texas (97 PPA & PPG; air, water and RCRA programs)	/ State experienced reporting reductions & savings preparing the PPG, but EPA did not experience any savings	† Burden increased in order to learn how to manage programs differently	† Did not incorporate all CPMs in PPA; not measuring environmental results	† Improved negotiations	
MAR Indiana (97 PPA & PPG and 98 PPA & PPG negotiation process)	† Financial management system increases administrative burden and decreases flexibility	/ Difficulty in shifting funds across programs, but some multi-media initiatives were funded	† Performance measures incorporated, but not measuring environmental results	/ Communication between Region and State improved; internal communication needs improvement	
MAR Delaware (97 PPG)	† Burden increased by placing administrative and technical requirements on top of existing ones	† Did not achieve flexibility	† No mention of measurement of environmental results	† Relationship strong, communication positive	

Note: The meeting summaries from the Providence and Denver NEPPS meetings are not included in this comparison chart because those meetings reflected a range of opinions and ideas, and did not result in summary findings in the key topic areas described here.

NEPPS Evaluations Summary Matrix

Report	Administrative Flexibility/ Burden Reduction	Programmatic Flexibility	Performance Measures	Planning and Partnership	Public Participation
MAR Georgia (97 PPG & PPA; air and groundwater programs)	Realized administrative efficiencies, but no reduction in reporting to Region; new consolidated grant administration procedures instituted	~ Did not need to move funds, but feels that the flexibility exists	CPMs starting to be incorporated, but not measuring results. Groundwater program developed performance measures	Process improved relationship by emphasizing partnership	Minimal past public involvement in PPA/PPG process, but taking steps to involve public more
MAR Colorado (97 PPG & 97/98 PPA)	~ No savings	/ Difficulty shifting funds within & across programs, but had some success funding cross-cutting initiatives	CPMs incorporated, but not measuring results	Partnership strengthened	Public participation increased
Region 4 IG Audit (PPG implementation & oversight)	/ Some states had reduced administrative burden while others had increased burden	~ States did not fully utilize flexibility for multi-media planning or prioritization of work	Delays in negotiating CPMs with states; not all states are including CPMs	Lack of communication between Region 4 and states led to confusion	
Region 8 IG Audit (PPG implementation & oversight)	/ States realized varying degrees of administrative savings; Tribes realized large savings; in general, reporting increased under PPGs	~ Flexibility not fully achieved due to barriers to shift funds	~ Confusion about CPMs; CPMs not clearly identified in workplans and still relying on measures of output	/ Relationship strengthened due to more joint partnership; in some instances the relationship between EPA & states was strained by NEPPS	
GAO (national NEPPS implementation)	/ Majority of states achieved modest reporting reductions; improved workload sharing & oversight reduction, and some states had increased reporting &/or oversight	Limited ability to shift resources across programs, but some multi-media projects funded	Progress with FY 2000 CPMs—fewer measures, more outcome-based. Several challenges identified in developing results-based measures	Improved EPA/State communication / relations; states more involved in joint enforcement planning & priority-setting; some instances of decreased oversight	~ Limited public participation so far, with few exceptions.

Legend (ratings inferred from evaluators' comments):

+ modest improvement; some success
 ~ little or no progress

/ some success, some failure
 + | tried and failed
 |

More Specific Summary Results

Administrative Flexibility/ Burden Reduction	Programmatic Flexibility	Performance Measures	Planning and Partnership	Public Participation
Positive Outcomes and Reasons for Success				
-- reduced reporting burden (MAR-TX, GAO) -- reduced paperwork to apply for & receive federal support (MARs CT, GA) -- 2 year grant cycle (MAR-CT) --flexibility in staffing (MAR-CT, GAO) -- reduced on-site reviews/ programmatic oversight (GAO) -- reduced number of grants (MAR-CT, Reg 8) -- condensed individual work plans (MAR-DE, GAO) -- workload sharing (GAO)	--money could be transferred across programs through PPG (GAO) -- high priority cross-cutting initiatives were able to be funded (MAR-CO)	--states/ programs that made progress already had performance based management system (GAO)	-- high management support & involvement (MARs CT, GA, CO) --central point of contact to coordinate, negotiate and manage PPA (MAR-CT) -- provided opportunity to jointly discuss priorities , thereby increasing communication (MARs CT, AL, TX, IN, DE, GA, CO, Reg 8, GAO)	
Examples of NEPPS Successes				
Connecticut MAR Texas MAR Georgia (MAR, Reg 4) Maine, Florida, Georgia, Minnesota (GAO)	Florida Quality Assessment Management Plan (GAO) Minnesota (reorganized agency to eliminate media-specific structure) (GAO) North Carolina (implemented multi-media inspection project)	--Groundwater program in Georgia has developed new performance measures that may serve as a model (MAR-GA) -- Minnesota has reorganized their agency to a multi-media structure and has made great progress in measuring performance (GAO)	-- Utah has a strong history of strategic planning and used NEPPS to bring Reg 8 and the regional health agency together to develop solutions to the region's environmental problems (Reg 8)	-- the PPA process increased public participation in Colorado and Connecticut (MARs CO & CT)

More Specific Summary Results

Administrative Flexibility/ Burden Reduction	Programmatic Flexibility	Performance Measures	Planning and Partnership	Public Participation
Tribes (Reg 8)	<p>(GAO)</p> <p>Colorado was able to fund pollution prevention and community-based environmental protection initiatives (MAR-CO)</p> <p>Delaware (funded the Whole Basin Initiative, a multi-media project) (MAR-DE)</p>			
Barriers/Reasons for Lack of Success				
<p>–state financial management systems are separated by media; built for administering categorical grants (MARs IN, DE, & CO)</p> <p>–administrative & technical requirements superimposed on existing processes (MARs DE & GA, Reg 8)</p> <p>–State legislative requirements for tracking funding by program (MAR-CO, GAO, Reg 4, Reg 8)</p> <p>–EPA statutory/regulatory reporting requirements (GAO)</p> <p>–EPA’s reluctance to reduce oversight w/o measurable assurances that goals are met (GAO)</p> <p>–Challenge of EPA communicating through a complex organization (GAO)</p>	<p>–difficulty shifting funds across programs, strong institutional barriers i.e. legal reporting requirements, strong constituencies, media-specific accounting/ information systems (MARs CT & CO, Reg 8, Reg 4, Denver, GAO)</p> <p>–lack of process to identify priorities & invest or disinvest (Reg 8)</p>	<p>–lack of or no data (MARs AL, IN, & CO, GAO, Reg 8, Denver)</p> <p>–hard to develop measures when there are different effects on the envt. and results aren’t immediate (MARs IN & CO, GAO)</p> <p>–lack of resources to build infrastructure for obtaining quality data (MAR-CT, GAO)</p> <p>–states do not want new requirements (MAR-IN, MAR-DE, Providence)</p> <p>–conflict between measuring performance under NEPPS and outputs under GPRA; EPA still asking for outputs (GAO, Reg 8, Denver)</p> <p>–conflict over how much states can deviate from CPMs and if they have to include in PPA (GAO, MAR-TX)</p> <p>–Regional staff disagreed over issue of CPMs being enough to ensure accountability (Reg 8)</p>	<p>–internal communication within both States & EPA needs improvement (MAR-IN, Providence, MAR-AL)</p> <p>–Regional staff disagree on how the program should be run—this results in the same or increased oversight (Reg 8, Providence)</p> <p>–not enough HQ support for NEPPS (Denver)</p> <p>–lack of NEPPS leadership & guidance from EPA (Denver, Providence)</p> <p>–overall confusion about NEPPS (Reg 8, Denver)</p> <p>–lack of resources—time, people, \$ (Denver)</p> <p>–conflicting priorities and</p>	

More Specific Summary Results

Administrative Flexibility/ Burden Reduction	Programmatic Flexibility	Performance Measures	Planning and Partnership	Public Participation
		–no agreement on who analyzes data for CPMs (Denver)	agendas within EPA, within states and between EPA & states (Denver, Providence)	
Recommendations				
<p>–States should select & implement a comprehensive financial management system in order to be equipped to handle cross-program funding (MARs IN & DE)</p> <p>–Region & State should discuss oversight approaches and should include enforcement staff (MAR-CO, GAO, Denver)</p> <p>–EPA should evaluate current reporting w/ GPRA requirements (Denver)</p> <p>–decide what is required in annual year reports and joint process evaluation (Reg 8, MAR-GA)</p> <p>– implement 2 year grant cycle (MARs CT & GA)</p> <p>–State & Region should work together and establish a time frame to identify & eliminate duplicate reporting (MAR-CT, Reg 4)</p> <p>–increase emphasis on adopting federal-state workload sharing (Providence)</p> <p>–establish a self-assessment process that will provide accountability and more informed differential oversight (Providence)</p>	<p>–EPA should develop written guidance on development and implementation of PPA/PPGs (MARs DE, IN & CO, Reg 8, Denver)</p> <p>–EPA & State should develop an organizational structure that supports multi-media and/or geographic-based approach to environmental protection (MAR-DE)</p> <p>–EPA & State should facilitate priority setting, allow disinvesting in lesser ones and shifting of resources (MARs CT & CO, GAO, Reg 4)</p>	<p>–work on developing performance measures that are better indicators of environmental results (MARs AL, TX, IN, DE, CO, GA & CT, GAO, Reg 8, Denver)</p> <p>–identify short term goals that would allow results to be seen early (MAR-IN)</p> <p>–clarify reporting requirements: define what needs to be reported on for CPMs (MAR-GA)</p> <p>–states & EPA should agree on whether CPMs are sufficient alone for accountability (Reg 8)</p> <p>–assign resp. to a specific office or person for monitoring progress in getting CPMs in PPGs & maintains communication (Reg 4)</p> <p>–need to better understand connection between GPRA & CPMs (Providence & Denver)</p> <p>–establish roles– determine whose responsibility it is to “roll up” data/analysis for CPM/GPRA (Denver)</p> <p>–Region 5 should consider reforming Indicators Steering Committee (MAR-IN)</p>	<p>–Region & State should jointly set priorities before State proposes budget (MAR-AL, Denver)</p> <p>–Region should keep State senior management & staff informed of NEPPS concept & its benefits (MARs IN & CO, GAO, Reg 4)</p> <p>–Region & State should ensure necessary people are trained in the process (to support cultural change) (MARs IN & CO, Providence)</p> <p>–roles and responsibilities and partnership need to be defined (MAR-GA, Reg 8)</p> <p>–Region & State should continue to work together on different issues such as CPMs, enforcement, annual evaluations, & work sharing (MARs CT & CO)</p> <p>–senior managers should be more involved in cross-media discussions (MAR-DE, Denver)</p> <p>–Region & State should consider cross program teams to negotiate PPA/PPG (MAR-GA, Denver)</p>	<p>–determine how effective public participation in NEPPS can be ensured (GAO, MARs GA & AL)</p>

More Specific Summary Results

Administrative Flexibility/ Burden Reduction	Programmatic Flexibility	Performance Measures	Planning and Partnership	Public Participation
		<p>–consider including performance measures as part of employee evaluation & reward system (Reg 8)</p>	<p>–require regional staff to attend and participate in all PPG related meetings (Reg 8)</p> <p>–encourage state reps to include state legislative staff in a joint priority setting session (Denver)</p> <p>–bring enforcement & compliance into NEPPS agreements (Providence)</p>	

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